

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

-----X  
In re :  
: Chapter 11  
:  
:  
ERIE KASH OUT PROPERTIES LLC :  
:  
:  
Case No. 25-11729 (AMC)  
Debtor. :  
-----X

**ENTRY OF APPEARANCE OF THE CITY OF PHILADELPHIA**  
**COMBINED WITH DEMAND FOR SERVICE OF PAPERS**

TO THE CLERK OF THE BANKRUPTCY COURT:

Kindly enter the appearance of PAMELA ELCHERT THURMOND, Esquire as counsel of record for creditor The City of Philadelphia and/or Water Revenue Bureau, where applicable, in the above-captioned matter.

PLEASE TAKE NOTICE that the City of Philadelphia and/or Water Revenue Bureau, (the “City”), a creditor and party-in-interest in the above-captioned case, hereby appears in the above-captioned case by its counsel, Pamela Elchert Thurmond, Senior Attorney; such counsel hereby enters their appearance pursuant to Title 11 of the United States Code, 11 U.S.C. § 101 et seq. (the “Bankruptcy Code”) and Fed. R. Bankr. P. 9010 (b), and such counsel hereby requests, pursuant to Fed. R. Bankr. P. 2002, 3017, 9007 and § 342 of the Bankruptcy Code, that copies of all notices and pleadings given or filed in the captioned case and served upon the City and to the attorney at the address and telephone number set forth below.

This Notice of Appearance and Demand for Notices and Papers shall not be deemed or construed to be a waiver of Creditor's rights: (1) to have final orders in noncore matters entered only after *de novo* review by a District Judge; (2) to trial by jury in any proceeding so triable in this case or any case, controversy, or proceeding related to this case; (3) to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, or (4) any other rights, claims, actions, setoffs, or recoupments to which Creditor is or may be entitled, in law or equity, all of which rights, claims, actions, defenses, setoffs and recoupments Creditor expressly reserves.

Respectfully submitted,

THE CITY OF PHILADELPHIA

Dated: May 20, 2025

By: /s/ Pamela Elchert Thurmond  
PAMELA ELCHERT THURMOND  
Senior Attorney  
PA Attorney I.D. 202054  
Attorney for the City of Philadelphia  
and/or  
Water Revenue Bureau  
City of Philadelphia Law Department  
Municipal Services Building  
1401 JFK Boulevard, 5<sup>th</sup> Floor  
Philadelphia, PA 19102-1595  
215-686-0508 (phone)  
Email: [Pamela.Thurmond@phila.gov](mailto:Pamela.Thurmond@phila.gov)

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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing Entry of Appearance of the City of Philadelphia was served by the means designated below, on the date set forth below, upon the following parties:

Via ECF Filing:

United States Trustee  
Office of United States Trustee  
Robert N.C. Nix Federal Building  
900 Market Street – Suite 320  
Philadelphia, PA 19107

JOHN HENRY SCHANNE  
Office of the Chapter 13 Standing Trustee  
900 Market Street, Suite 320  
Philadelphia, PA 19107

MICHAEL I. ASSAD  
Sadek Law Offices, LLC  
1500 JFK Boulevard – Suite 220  
Philadelphia, PA 19102

BRAD J. SADEK  
Sadek Law Offices, LLC  
1500 JFK Boulevard – Suite 220  
Philadelphia, PA 19102

HOLLY SMITH MILLER, ESQ.  
Gellert Seitz Busenkell & Brown LLC  
901 Market Street – Suite 3020 or Suite 1901  
Philadelphia, PA 19107

Via USPS Mail Delivery:

Erie Kash Out Properties LLC  
255 West Fisher Avenue  
Philadelphia, PA 19120

Respectfully submitted,

Date: May 20, 2025

By: /s/ Pamela Elchert Thurmond  
PAMELA ELCHERT THURMOND  
Senior Attorney  
PA Attorney I.D. 202054